



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

April 18, 2013

Ted Schade  
Air Pollution Control Officer  
Great Basin Unified Air Pollution Control District  
157 Short Street  
Bishop, California 93514

Dear Mr. Schade:

Thank you for your submission of the Great Basin Unified Air Pollution Control District's (GBUAPCD's) 2012 Ambient Air Monitoring Network Plan in June 2012. Based on the information provided in the plan, EPA approves all portions of the network plan except those specifically identified below.

Annual network plans are important documents for regulatory purposes (e.g., State Implementation Plans, designations and redesignations) and public information, in addition to the myriad uses by the air districts. EPA is revising the review process for annual network plans to specifically check and document the comprehensive set of items that are required to be included in the annual network plans per 40 CFR 58.10 in a consistent manner. We have created a checklist that lists all these items and have included it as Attachment A. While the items in the checklist are required by EPA regulations, we acknowledge that we have not specifically requested some of this information in previous annual network plan reviews. We recognize that your plan may not have all the items that we have currently identified and hope to work with you on the inclusion of these items in future plans. To facilitate these changes, EPA has provided detailed feedback in the checklist where information should be included or revised in next year's plan.

Please note that we cannot approve portions of the annual network plan for which the information in the plan is insufficient to judge whether the requirement has been met, or for which the information, as described, does not meet the requirements as specified in 40 CFR 58.10 and the associated appendices. EPA Region 9 also cannot approve portions of the plan for which the EPA Administrator has approval authority. Accordingly, we are not acting on the specific portions of your agency's annual network plan listed in Attachment B.

All of the comments in Attachments A, B, and C should be addressed in next year's network plan. Also, GBUAPCD received comments from the Los Angeles Department of Water and Power (LADWP) on specific portions the annual network plan during the public comment period. GBUAPCD's responses to these comments were included with the network plan

submittal. EPA also received separate comments on the annual network plan outside of the comment period. EPA has determined that GBUAPCD's responses to the substantive comments are adequate and has provided supplemental responses to the substantive comments in Attachment D. If you have any questions regarding this letter or the enclosed comments, please feel free to contact me at (415) 972-3851 or Michael Flagg at (415) 972-3372.

Sincerely,

/s/

Matthew Lakin, Manager  
Air Quality Analysis Office

Enclosures:

- A. Annual Air Monitoring Network Plan Checklist
- B. Elements where EPA is Not Taking Action
- C. Additional Detailed Comments
- D. Response to Comments

cc: Christopher Lanane, GBUAPCD  
Karen Magliano, CARB

## **Attachment B: Annual Air Monitoring Network Plan Items where EPA is Not Taking Action**

We are not acting on the portions of annual network plans where either EPA Region 9 lacks the authority to approve specific items of the plan, or EPA has determined that a requirement is either not met or information in the plan is insufficient to judge whether the requirement has been met.

- NCore monitoring requires EPA Administrator approval. Per 40 CFR 58.11(c), NCore network design and changes are subject to approval of the EPA Administrator. Therefore, we are not acting on these items.
- System modifications (e.g., site closures or moves) are subject to approval per 40 CFR 58.14(c). Information provided in the plan was insufficient for EPA to approve the following system modification listed in the plan per the applicable requirement: relocation of the Flat Rock PM<sub>10</sub> SLAMS site. Therefore, we are not taking action on this item as part of this year's annual network plan.
- EPA identified items in your agency's annual network plan where a requirement was not being met or information in the plan was insufficient to judge whether the requirement was being met based on 40 CFR 58.10 and the associated appendices. Therefore, we are not acting on the following items:

<b>Item</b>	<b>Checklist Row (Attachment A)</b>	<b>Issue</b>
Distance to roadway	62	Insufficient information to judge
Traffic count	63	Insufficient information to judge
Scale of representation	16	Insufficient information to judge
Distance between collocated monitors	33	Insufficient information to judge
Distance from supporting structure	66	Insufficient information to judge
PM <sub>2.5</sub> monitors represent community wide air quality at neighborhood scale	54	Insufficient information to judge
Population-oriented PM <sub>2.5</sub> site in area of expected max concentration	55	Insufficient information to judge
PM <sub>2.5</sub> background/transport site	58	Insufficient information to judge
Document how agency will provide for the review of changes to PM <sub>2.5</sub> network	22	Insufficient information to judge
Precision and accuracy reports	23	Insufficient information to judge
Data certification	24	Insufficient information to judge
Parameter occurrence code	43	Insufficient information to judge
Sampling and analysis method	13	Insufficient information to judge in some instances
Method code	37	Insufficient information to judge in some instances
Monitor start date	38	Insufficient information to judge
Monitor type	39	Insufficient information to judge
Monitoring objective	40	Insufficient information to judge
Parameter code	42	Insufficient information to judge
Statement of purpose	2	Insufficient information to judge
NCore site information	7	Insufficient information to judge
Frequency of 1-pt QC checks	28	Insufficient information to judge
Date of annual PE audits	29	Insufficient information to judge
Probe material	72	Insufficient information to judge
Residence time	73	Insufficient information to judge

Additional information for each of these items is included in Attachment A.

### **Attachment C: Additional Detailed Comments**

- The Coso Junction PM<sub>10</sub> site is characterized as “regional scale” on p.7, but listed as “neighborhood” in the site report in Appendix A. Therefore, please correct this discrepancy in next year’s plan.
- While some of the dates for PM<sub>10</sub> semi-annual flow audits are missing from the Appendix A site reports, EPA has reviewed information provided by the district and has confirmed that this requirement is currently being met. Please provide the dates of the semi-annual flow audits for each monitor in next year’s plan.
- The PM<sub>10</sub> monitors in the network are currently monitoring at the correct frequency, but information included in the plan is unclear. Please provide the specific operating schedules for each monitor in next year’s plan.
- While the collocation requirement for manual PM<sub>10</sub> monitors is currently being met, please include more detailed information concerning the PM<sub>10</sub> collocation requirement and specific information on the operating schedules for manual PM<sub>10</sub> monitors at the Keeler site.

## Attachment D: Response to Comments

The Los Angeles Department of Water and Power (LADWP) submitted comments to the Great Basin Unified Air Pollution Control District (GBUAPCD) on May 16, 2012, during the comment period held by GBUAPCD on its proposed 2012 annual network plan (2012 ANP). GBUAPCD responded to these comments in a memorandum dated May 23, 2012, which was included with the final 2012 ANP submitted to EPA on June 29, 2012. LADWP subsequently sent a letter to EPA on September 28, 2012 expanding upon the comments made in the May 16, 2012 letter, and providing responses to GBUAPCD's responses in the May 23, 2012 memorandum. LADWP sent further comments on January 8, 2013 supplementing their comments submitted on September 28, 2012.

**Comment:** LADWP acknowledges that GBUAPCD's state or local air monitoring stations (SLAMS)<sup>1</sup> network is covered under an approved California Air Resources Board (ARB) Quality Assurance Plan (QAP). However, LADWP contends that the ARB QAP does not cover the use of the data used to identify supplemental dust control areas on Owens Lake because the ARB QAP does not properly assure quality for all the instrument systems that are used in the dust source identification process. LADWP also notes that some of the instrument system elements that are not covered by the QAP (e.g. sand motion monitoring and video monitoring) are described in the 2012 ANP. LADWP also requests that GBUAPCD update its PM<sub>10</sub> and PM<sub>2.5</sub> Quality Assurance Project Plans (QAPPs) for particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM<sub>10</sub>) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM<sub>2.5</sub>) to include all of the instrument systems that are required to implement the procedures described in the 2008 Owens Valley State Implementation Plan (2008 SIP), and have those QAPPs approved in a public proceeding.

**Response:** The requirements contained in 40 CFR Part 58 Appendix A, including the requirements for QAPPs, are applicable to SLAMS air monitoring data and Prevention of Significant Deterioration (PSD) data.<sup>2</sup> These requirements also apply to all special purpose monitor (SPM)<sup>3</sup> stations using a federal reference method (FRM), a federal equivalent method (FEM), or an approved regional method (ARM), which meets the requirements of 40 CFR Part 58 Appendix E.<sup>4</sup> LADWP's initial comments on the 2012 ANP and their subsequent September 28, 2012 letter both acknowledge that the GBUAPCD's SLAMS network is covered by ARB's QAP. As the additional instrument systems mentioned by LADWP in their comments are not SLAMS and do not use FRM, FEM or ARM methods, information pertaining to the operation of

---

<sup>1</sup> "The SLAMS make up the ambient air quality monitoring sites that are primarily needed for NAAQS comparisons, but may serve other data purposes. SLAMS exclude special purpose monitor (SPM) stations and include NCore, PAMS, and all other State or locally operated stations that have not been designated as SPM stations." 40 CFR 58.1.

<sup>2</sup> 40 CFR 58.11(a)(1); 40 CFR Part 58, Appendix A, § 1.

<sup>3</sup> "An SPM is defined as any monitor included in an agency's monitoring network that the agency has designated as a special purpose monitor in its annual monitoring network plan and in AQS, and which the agency does not count when showing compliance with the minimum requirements of this subpart for the number and siting of monitors of various types." 40 CFR 58.20(a).

<sup>4</sup> 40 CFR 58.20(b); 40 CFR Part 58, Appendix A, § 1.

those instruments and the subsequent data use in the dust source identification process is not required to be included in QAPPs under 40 CFR 58 Appendix A. Furthermore, there are no requirements that QAPPs must undergo a public review process prior to submission and approval by EPA or the PQAO (primary quality assurance organization).

**Comment:** The current GBUAPCD monitoring network design is problematic because it focuses on Owens Lake and does not adequately assess contributions from other source areas. LAWDP also requests that GBUAPCD identify the major off-lake source areas and monitor them for both sand motion and dust emissions.

**Response:** Comments concerning which sources are influencing specific monitors are beyond the scope of what EPA is required to review and approve as part of the annual network plan process. Generally, ambient air monitoring network design is performed by the State or local air districts and there are no specific requirements in 40 CFR Part 58 Appendix D, 4.6 that mandate a PM<sub>10</sub> network capture influences from specific sources. Currently, the PM<sub>10</sub> network in the Owens Lake nonattainment area meets the applicable requirements in 40 CFR 58 Appendix D.

**Comment:** The Keeler PM<sub>2.5</sub> and PM<sub>10</sub> monitors, and the North Beach PM<sub>10</sub> monitor appear to violate the EPA siting criteria contained in 40 CFR Part 58 Appendix E, §3(a) due to their close proximity to a number of unpaved roads.

**Response:** As explained in 40 CFR 58 Appendix E, §3(a), it is important to understand the monitoring objective for a particular location in order to interpret the requirement for spacing from minor sources. The Keeler and North Beach monitoring sites are characterized as having population oriented<sup>5</sup> (population exposure) and source impact (source oriented) site types, respectively.<sup>6</sup> 40 CFR 58 Appendix E, §3(a) explains that if the objective for a monitoring site is to investigate local PM<sub>10</sub> sources, then the site is likely to be properly located nearby. Furthermore, in these instances, capturing the influence of emissions from nearby unpaved roads may be important, and moving these monitors away from such sources may underestimate the population's exposure to harmful levels of PM<sub>10</sub> and PM<sub>2.5</sub>. Due to the monitoring objectives of these sites and their distance from roadways, the presence of nearby unpaved roads does not violate EPA's siting criteria in 40 CFR 58 Appendix E.

**Comment:** The 2012 ANP does not adequately explain the April 2011 discontinuation and relocation of the Flat Rock PM<sub>10</sub> monitor to the Mill Site.

**Response:** EPA agrees that there was insufficient information included in the 2012 ANP concerning the shutdown and relocation of the Flat Rock PM<sub>10</sub> monitor. System modifications to the SLAMS network must meet specific criteria outlined in 40 CFR 58.14 and be subsequently approved by EPA. As there was not enough information to judge whether the shutdown and relocation of the Flat Rock monitor was appropriate, EPA is not taking action at this time on the

---

<sup>5</sup> *Population-oriented monitoring (or sites)* means residential areas, commercial areas, recreational areas, industrial areas where workers from more than one company are located, and other areas where a substantial number of people may spend a significant fraction of their day.

<sup>6</sup> 2012 ANP, Table 2.

modification and will work closely with GBUAPCD to appropriately document the shutdown and relocation.

**Comment:** The 2012 ANP does not provide documentation that siting issues at the Coso Junction monitoring site have been corrected and data from the site cannot be used to assess the contributions from Owens Lake.

**Response:** While the documentation of the siting issue at Coso Junction was discussed in 75 FR 54031 and in subsequent correspondence, EPA agrees that the ANP should contain a statement that describes the actions taken to address previously identified siting issues at the Coso Junction monitoring site. In regards to the data, an assessment of whether the data from a specific monitor is influenced by a particular source is beyond the scope of what EPA is required to review and approve as part of the annual network plan process. Generally, ambient air monitoring network design is performed by the State or local air districts and there are no specific requirements in 40 CFR Part 58 Appendix D, 4.6 that mandate a PM<sub>10</sub> network capture influences from specific sources. In the 2012 ANP, the Coso Junction is appropriately characterized as a population oriented (population exposure) and pollutant transport (regional transport) regional scale monitoring site.

**Comment:** Information concerning the proposed new locations of the T-4 and T-23 non-regulatory SPMs is not included in the 2012 ANP.

**Response:** As described in the 2012 ANP and GBUACPD's responses to LADWP's comments, the T-4 and T-23 monitors are non-regulatory special purpose monitors that are being used to measure PM<sub>10</sub> emissions near the remaining source areas on the lakebed and to further refine the District's Dust Identification Program model. As these monitors are only being used in short-term special studies, EPA generally does not require information for such monitors to be included as part of the ANP. Furthermore, while EPA approval is required for addition and discontinuation of SLAMS, no such approval is required for changes in SPM stations.<sup>7</sup>

**Comment:** EPA cannot approve the 2012 network plan, because it includes monitors that are no longer part of GBUACPD's network as a result of LADWP's termination of the Dirty Socks, Mill Site, and North Beach monitor licenses. GBUACPD must withdraw the current 2012 Network Plan from EPA and amend the plan to remove these monitoring stations from its network.

**Response:** GBUAPCD is not required to withdraw and resubmit the 2012 ANP due to changes in the network after submittal to EPA. The shutdown of the Dirty Socks, Mill Site, and North Beach PM<sub>10</sub> monitors were not approved by EPA in accordance with 40 CFR 58.14. ANPs are the appropriate mechanism to document changes to the network. EPA expects that information pertaining to the shutdown of these monitors will be included in future ANPs.

---

<sup>7</sup> 40 CFR 58.10(e), 58.11(c).